



ARKANSAS TELEPHONE COMPANY

DOCKET FILE COPY ORIGINAL

"Telecommunications for Arkansas"

VIA COURIER

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Arkansas Telephone Company, Inc.
499 Filer ID: 802047
FRN: 0003-7323-02
Certification of CPNI Procedures and
Statement of Compliance Concerning CPNI Rules
EB Docket No. 06-36 and EB-06-TC-060;
Certification of CPNI
Filing Due Date: February 6, 2006

Dear Ms. Dortch:

Pursuant to Commission's Public Notice of January 30, 2006 (DA 06-223), the Public Notice of February 2, 2006 (DA-258), and 47 C.F.R. §64.2009(e) the undersigned, An officer of Arkansas Telephone Company, Inc. certifies that the Company has established and implemented policies and procedures to ensure that it complies with the Commission's rules regarding customer proprietary network information ("CPNI") found in 47 C.F.R. Part 64, Subpart U, with respect to all services subject thereto.

These policies and procedures are outlined in the attached Statement of Compliance and the Company's compliance with those procedures are made by a Certification of CPNI procedures which are also an attachment to this letter.

This letter and its attachments are being sent to constitute the Company's filing required by the above referenced public notice.

Sincerely,

Randy McCaslin
President

Cc: Byron McCoy, Enforcement Bureau
Best Copy and Printing, Inc.

No. of Copies rec'd
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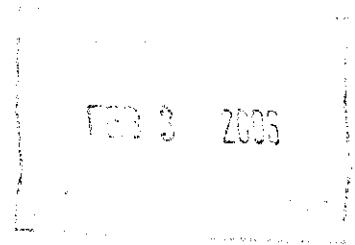
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**FCC FILING CONCERNING
CUSTOMER PROPRIETARY NETWORK INFORMATION
(HEREINAFTER "CPNI")**

Arkansas Telephone Company, Inc.

499 Filer ID: 802047

FRN: 0003-7323-02



**In response to EB Docket No. 06-36 and EB-06-TC-060
Public Notice: DA 06-223 and DA 06-258**

**CERTIFICATION OF CPNI PROCEDURES
FEBRUARY 6, 2006**

On behalf of Arkansas Telephone Company, Inc. (hereinafter "The Company"). I certify the following:

1. I am an officer of the Company.
2. I am familiar with the CPNI operating procedures of the Company. I have personal knowledge that the operating procedures are being used by the Company and the operating procedures are adequate and specifically designed to ensure compliance with Section 222 of the Communications Act of 1934, as amended, and the Federal Communication Commission's Customer Proprietary Network Information (CPNI) rules as set forth in Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R §64.2001 through §64.2009.
3. The Company maintains appropriate certification of its compliance with CPNI requirements and monitors operating procedures to ensure continued compliance.

Randy McCaslin
Officer's Printed Name

Randy McCaslin
Officer's Signature

President
Title

February 2, 2006
Date

Arkansas Telephone Company, Inc.

499 Filer ID: 802047

FRN: 0003-7323-02

In response to EB Docket No. 06-36 and EB-06-TC-060

Public Notice: DA 06-223 and DA 06-258

**STATEMENT OF COMPLIANCE
CONCERNING THE FCC'S
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) RULES**

Arkansas Telephone Company, Inc. (hereinafter "The Company") has operating procedures to ensure that the Company remains in compliance with the FCC's CPNI Rules. The Company and its employees are trained and understand that disclosure of or permitting access to our customers' CPNI is not allowed without obtaining the requisite customer approval, except as required by law, or the exceptions set forth in 47 U.S.C. §222, and Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R §64.2001 through §64.2009.

The Company developed and has maintained internal procedures to educate our employees about CPNI, the prohibitions on disclosure, and the exceptions to the prohibited disclosure of CPNI. Our employees are instructed on the legal definition of CPNI including that CPNI is information that relates to the quantity, technical configuration, type, destination, location and amount of use of the telecommunications services subscribed to by any customer of the Company that is made available to the Company by the customer solely by virtue of our relationship with our customers; and information contained in the bills pertaining to telephone exchange service or toll service of other carriers that the Company bills for received by our customers; except that such term does not include subscriber list information. All the Company employees that have access to this information are aware of the FCC's rules and are prohibited from disclosing or permitting access to CPNI without the appropriate customer consent or as allowed by law and the FCC rules. Any employee that discloses CPNI is subject to disciplinary action, and possible termination. The Company also ensures that our vendors that lawfully have access to our customer CPNI, such as a billing company or software provider, are aware of the CPNI rules and will not disclose CPNI information except as allowed by law.

Other than the permitted and legal use of CPNI such as by customer approval, as required by law, and the exceptions set forth in 47 U.S.C. §222, and Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R §64.2001 through §64.2009, CPNI is not used by the Company. The Company notifies customers of their right to restrict access to, use of, and disclosure of their CPNI. Periodic notices and one-time notices are provided as appropriate.

Such notices may be provided through multiple methods, such as bill inserts, notices published in the telephone directory, notices included on the Company's website, and oral notice provided during a telephone contact. The Company maintains records of all notices and approvals for at least one year.

Customer notification and approval methods if CPNI is ever used by the Company through customer approval is as set forth below:

Opt-In Notice – This approval method is required for disclosure of CPNI to unrelated third-parties or to affiliated carriers that do not provide communications-related services. This requires the Company to obtain the customer's express, affirmative consent allowing the use and release of CPNI. This does not apply to subscriber listing information given to other carriers for telephone directories pursuant to FCC Rules.

Opt-Out Notice- This method is required for disclosure of CPNI to affiliated entities providing communications-related services, as well as third party agents and joint venture partners providing communications related services. Under this method, the customer is deemed to have consented to the use, disclosure or access to the customer's CPNI if the customer has failed to object thereto within a minimum of 30 days from receiving notice.

If our customers' CPNI is used for sales and marketing campaigns, the appropriate safeguards are taken as set forth in 47 C.F.R. §64.2009.

Randy McCaslin
Officer's Printed Name

Randy McCaslin
Officer's Signature

President
Title

February 2, 2006
Date